

STATE OF COLORADO

Bill Owens, Governor
Jane E. Norton, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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Colorado Department
of Public Health
and Environment

January 29, 2001

Mr. Joseph A. Legare
Assistant Manager for Environment and Infrastructure
U.S. Department of Energy
Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, Colorado 80403-8200

Dear Mr. Legare:

RE: Comments on the 1999 Annual RFCA Groundwater Monitoring Report

Section 3.1 – Our comments on last year's report contained detailed elevation information for building drains. The elevations posted on Plates 2 & 3 do not appear to coincide with the information we provided. There is no discussion of the source of the drain elevation information. Was this information reviewed and evaluated?

Section 7.1.6- Sampling recommendations for IHSS 118.1-We agree with all 3 recommendations.

Section 7.2, Table 7-5 – Proposed sampling for 903 Pad/Ryan's Pit plume- We agree with all changes proposed.

Section 8.2 Groundwater ICP/MS Sampling Project- The State has a slightly different analysis of this data, which evaluates the background variability of the U235/U238 ratio. This analysis needs more information on the U236 data before it can be completed. The last paragraph of this section on page 119 recommends future sampling for total uranium use alpha spectrometry only. Is this what was intended? The Radionuclide Final Rule published in the Federal Register contains a good discussion of analytical methods in Section I, page 76724.

Section 8.4.1 -We request the GIS coverages mentioned here, the updated plume maps and the intercept systems.

Section 10.2 -We request an update of the Equis database containing the geologic and completion information for these wells.

Section 11.2.2 -We appreciate that the Lab Control Sample information is now included in the Quarterly and Annual reports however we do not understand why this information is not used to qualify results when approximately 28% of the LCS samples for radionuclides were outside the 80-120% recovery acceptable range.

Section 11.2.3-This section does not mention how many results were rejected due to out of bounds LCS samples. The LCS data appears to be in 2 different formats in table 11-4, one of which is understandable as % recovery data. This data contains some LCS with 0% recovery and others outside the 80-120% range. This data should be used in validating the results.

Should you have questions on our comments please contact Elizabeth Pottorff at 303-692-3429.

Sincerely,



Steven H. Gunderson
Rocky Flats Project Coordinator

SHG/ETP/etp

cc: Tim Rehder, EPA
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Glenn Doyle, DOE
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